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March 4, 1986

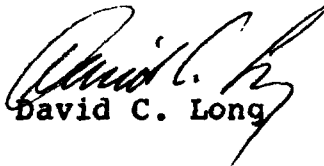
Director, Waste Management Division
United States Environmental Protection Agency
Region V (5HR) 230 South Dearborn Street
Chicago, IL. 60604

Re: United States of America vs.
Chemical Recovery Systems, Inc.
United States District Court
Northern District of Ohio
Eastern Division
Case No: C80-1858

Dear Sir:

Enclosed please find a copy of a Motion to Show Cause as well as a brief Memorandum in Support thereof which I have filed in the above captioned matter on behalf of Defendant, Chemical Recovery Systems, Inc..

Very truly yours,


David C. Long

DCL/mjk
encl.

RECEIVED
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U.S. EPA REGION V
WASTE MANAGEMENT DIVISION
HAZARDOUS WASTE ENFORCEMENT GROUP

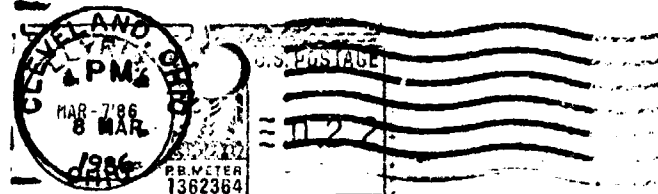
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Division
United States Environmental
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Region V (5HR) 230 South
Dearborn Street
Chicago, IL. 60604



UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

UNITED STATES OF AMERICA

Plaintiff

vs.

CHEMICAL RECOVERY
SYSTEMS, INC. et al.

Defendant

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JUDGE: DOWD

CASE NO: C80-1858

MOTION TO SHOW CAUSE

Now comes Defendant, Chemical Recovery Systems, Inc., and respectfully moves the Court for an Order requiring Plaintiff to appear and show cause why it has failed to issue a written notice terminating the provisions of the Consent Decree in this case, pursuant to Article X thereof.



David C. Long
Attorney for Defendant,
Chemical Recovery Systems, Inc.
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MEMORANDUM IN SUPPORT OF MOTION

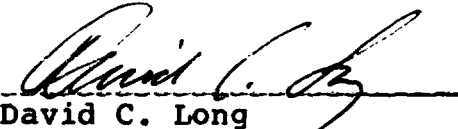
On or about July 25, 1985 Defendant, Chemical Recovery Systems, Inc., forwarded to DIRECTOR, WASTE MANAGEMENT DIVISION, U.S. E.P.A., Region V, a copy of the final testing report required by the provisions of the Consent Decree entered in this case along with a notice that testing had been completed.

Article X of said Consent Decree provides as follows:

The provisions of this Consent Decree shall terminate upon CRS' receipt of written notice from U.S. EPA that the remedial and monitoring provisions of this Decree have been successfully completed. Such notice shall issue within sixty (60) days of the date that CRS performs the last act required of it by this Decree and so informs U.S. EPA unless the Court orders otherwise.

More than sixty (60) days have elapsed since Defendant, Chemical Recovery Systems, Inc., completed the testing required by said Consent Decree and Plaintiff has failed to terminate the provisions thereof by forwarding written notice of completion as set forth in Article X of said Decree.

Respectfully submitted,


David C. Long
Attorney for Defendant,
Chemical Recovery
Systems, Inc.
(216) 323-3331

PROOF OF SERVICE

Copies of the foregoing and attached Motion to Show Cause were forwarded by regular U.S. Mail this ____ day of _____, 1986, to the following:

Director, Waste Management Division
United States Environmental Protection Agency
Region V (5HR) 230 South Dearborn Street
Chicago, IL. 60604

Kathleen Sutula, Esq. Assistant United States Attorney
1404 East Ninth Street, Suite 500
Cleveland, Ohio 44114

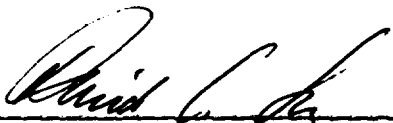
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David C. Long, Attorney for
Defendant, Chemical Recovery
Systems, Inc.